



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 10, 2025

Application granted. The parties shall file a status update by July 1, 2025.

The Honorable Katherine H. Parker
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

SO ORDERED:

06/11/2025


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

Re: *M.Q. v. United States of America*, 22 Civ. 10680 (ALC) (KHP)

Dear Judge Parker:

I represent the United States of America (the “Government”) in the above-captioned action brought pursuant to the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 1346(b), 2671 *et seq.* I write respectfully on behalf of both parties, pursuant to the Court’s May 28, 2025 order directing the parties to provide a status update on settlement by June 10, 2025 (ECF No. 166), and to request a three-week extension of the stay of discovery.

As explained in our prior letters to the Court (ECF Nos. 159, 162, and 165), after making significant progress in discovery, on March 19, 2025, the Court granted the parties’ request for a stay of discovery for the purpose of focusing their time on continuing to work towards a settlement in this case. (ECF No. 160). On May 1, 2025, the Government informed the Court that counsel had requested settlement approval from ICE in an amount that Plaintiff has represented she would accept but that ICE required additional time to review the request. (*See id.*). The Court granted the request to extend the stay until May 27 and later extended the stay until June 10. (ECF Nos. 163 and 166).

At present, ICE is continuing to review the request for settlement authority from Government counsel. Accordingly, the parties respectfully request that the Court continue the stay of discovery for three weeks, until July 1, 2025, so that the parties can conserve resources while they attempt to resolve this matter. In addition, this case was recently transferred to the undersigned counsel for the Government as prior counsel is on parental leave, and counsel requires time to familiarize himself with the case.

The parties propose to provide a status update to the Court on or before July 1, 2025, as to whether they have achieved a settlement.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Harry Fidler
HARRY K. FIDLER
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel.: (212) 637-2321
Email: harry.fidler@usdoj.gov

cc: Plaintiff (via ECF)